

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA

v.

JAMES COYNE,  
Defendant.

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Criminal No. 2:16-cr-154

**UNOPPOSED MOTION TO ENLARGE TIME TO RESPOND TO DEFENDANT'S  
MOTION TO SUPPRESS EVIDENCE AND STATEMENTS**

The United States of America, by and through its attorney, Eugenia A. P. Cowles, Acting United States Attorney for the District of Vermont, hereby moves to enlarge by four days the deadline to respond to the defendant's Motion to Suppress, filed May 17, 2017. The government's response to the Motion is currently due on June 26, 2017. The proposed enlargement would extend that deadline until June 30, 2017. Defense counsel, Steven Barth, Esq., has advised the undersigned that he does not oppose the government's motion for enlargement of time to respond.

The Motion required the undersigned to acquire information and affidavits from Microsoft and the National Center for Missing and Exploited Children (NCMEC). The Government has secured declarations from both companies. The Government just received Microsoft's declaration on June 23, 2017. That declaration was required to provide the court with an accurate and comprehensive background section for the government's brief in response to the motion to suppress. Further, the undersigned had to travel out of town unexpectedly at the beginning of this week. The relatively modest proposed enlargement would permit the government to provide this Court with as complete and thorough a response as possible to the

Motion. The Government does not anticipate seeking any further enlargement of the response deadline.

For these reasons, the government respectfully requests that the Court enlarge the time in which the government must file its response until June 30, 2017.

Dated at Burlington, in the District of Vermont, this 26th day of June 2017.

Respectfully submitted,

UNITED STATES OF AMERICA

EUGENIA A. P. COWLES  
Acting United States Attorney

By: */s/ Christina Nolan*  
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**CERTIFICATE OF SERVICE**

I, Liza G. LaBombard, Legal Assistant for the United States Attorney for the District of Vermont, do hereby certify that on June 26, 2017, I electronically filed the Government's **UNOPPOSED MOTION TO ENLARGE TIME TO RESPOND TO DEFENDANT'S MOTION TO SUPPRESS EVIDENCE AND STATEMENTS** with the Clerk of the Court using the CM/ECF system.

/s /Liza G. LaBombard  
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